

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

INSIGNIA SYSTEMS, INC.,

Plaintiff,

v.

NEWS CORPORATION, NEWS AMERICA
MARKETING FSI L.L.C., and NEWS
AMERICA MARKETING IN-STORE
SERVICES L.L.C.,

Defendants.

Case No.: 19-cv-1820 MJD/BRT

JURY TRIAL DEMANDED

STATEMENT INSTEAD OF REDACTED DOCUMENT

Plaintiff Insignia Systems, Inc., in connection with its September 8, 2020 Declaration of Gloria Park in Support of Plaintiff's Motion to Compel Production of Documents filed four Sealed Exhibits (Exs. 13, 20, 22, and 30), which contain information designated as "Attorneys' Eyes Only" and are being filed pursuant to the November 4, 2019 Protective Order (Dkt. 57).

This statement is filed in lieu of a redacted copy because the entire document is confidential, rendering redaction impracticable.

Dated: September 8, 2020

Respectfully submitted,

/s/ Y. Gloria Park

SUSMAN GODFREY LLP

William Christopher Carmody (*pro hac vice*)

New York State Bar No. 4539276

bcarmody@susmangodfrey.com

Arun Subramanian (*pro hac vice*)

New York State Bar No. 4611869
asubramanian@susmangodfrey.com
Mark Musico (*pro hac vice*)
New York State Bar No. 5238001
mmusico@susmangodfrey.com
Y. Gloria Park (*pro hac vice*)
New York State Bar No. 5477047
gpark@susmangodfrey.com
1301 Avenue of the Americas, 32nd Floor
New York, New York 10019
Telephone: (212) 336-3330
Fax: (212) 336-8340

Alejandra C. Salinas (*pro hac vice*)
Texas State Bar No. 24102452
asalinas@susmangodfrey.com
1000 Louisiana Street, Suite 5100
Houston, Texas 77002
Telephone: (713) 651-9366
Fax: (713) 654-6666

Rachel S. Black (*pro hac vice*)
Washington State Bar No. 32204
rblack@susmangodfrey.com
1201 Third Avenue, Suite 3800
Seattle, WA 98101
Telephone: (206) 516-3880
Fax: (206) 516-3883

NAPOLI SHKOLNIK PLLC
Hunter Shkolnik (*pro hac vice*)
New York State Bar No. 2031458
hunter@napolilaw.com
360 Lexington Avenue, 11th Floor
New York, New York 10017
Telephone: (212) 397-1000

BLACKWELL BURKE P.A.
Jerry W. Blackwell
Minnesota State Bar No. 186867
blackwell@blackwellburke.com
S. Jamal Faleel
Minnesota State Bar No. 320626

jfaleel@blackwellburke.com
431 South Seventh Street, Suite 2500
Minneapolis, MN 55415
Telephone: (212) 343-3200
Fax: (212) 343-3205

Attorneys for Plaintiff Insignia Systems, Inc.